

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

**BOBBY BLAND, DANIEL RAY CARTER,  
JR., DAVID W. DIXON, ROBERT W.  
MCCOY, JOHN C. SANDHOFER, and  
DEBRA H. WOODWARD**

**Plaintiffs,**

**CASE NO. 4:11-CV-45**

**v.**

**B.J. ROBERTS, individually and in his  
official capacity as Sheriff of the City of  
Hampton, Virginia**

**Defendant.**

**DECLARATION**

I, Jim Adams, having direct knowledge of the information set forth below, hereby  
depose and declare as follows:

1. I am a citizen and resident of the Commonwealth of Virginia and the  
United States.
2. I served in the Hampton Sheriff's Office as deputy to the Sheriff of the  
City of Hampton for 16 years. I retired as Lieutenant Colonel in the office and the third  
most senior officer.

**EXHIBIT**

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3. During my tenure as a senior officer in the Hampton Sheriff's Office I became intimately familiar with the training requirements for deputies, the legal authority for their power and the limits of same.


4. Deputies within the Hampton Sheriff's Office were not law enforcement officers because they did not attend the Virginia Department of Criminal Justice Services "Basic Law Enforcement Officer" course. This course is necessary to be deemed a law enforcement officer with general and immediate powers of arrest.

5. I cannot recall an instance in my entire career in service in the Hampton Sheriff's Office under B. J. Roberts where any Hampton deputy sheriff has arrested anyone.

6. It was well known by Sheriff Roberts and his senior staff that I was especially close to all of the Plaintiffs in the action and especially to Debbie Woodward. I retired from the Hampton Sheriff's Office in January of 2009. As of the time I left, all of the Plaintiffs in this action had reputations as outstanding deputies and employees of the Hampton Sheriff's Office.

I declare under penalty of perjury that the foregoing is true and correct.

12/23/11  
Date

  
Jim Adams